FORM TO BE USED BY A PRISONER FILING A COMPLAINT
UNDER THE CIVIL RIGHTS ACT, 42 U.S.C. §1983

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND _____FILED _____ENTERED
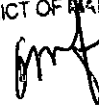_____LODGED _____RECEIVED

Tracy LaMonte Skinner #317270

North Branch Correctional Inst.

14100 McMullen Hwy, S.W.

Cumberland, Md. 21502.

(Full name, prison identification
number and address of the plaintiff)

JAN 16 2014

AT BALTIMORE
CLERK U.S. DISTRICT COURT
DISTRICT OF MARYLAND
BY   DEPUTY

v.

Civil Action No. JFm-14-145
(Leave blank on initial filing to be filled in by Court.)

Cpt. K. Ibeadagbulem, ofc. Juliet NGeh,

Lt. David Johnson, Sgt. Owens,

Ofc. Fredericks co II all of

Patuxent Inst. Jessup MD 20794
(Full name and address of the defendant(s))

**RECEIVED
PRO SE**

JAN 16 2014

AT BALTIMORE
CLERK U.S. DISTRICT COURT
DISTRICT OF MARYLAND
BY _____ DEPUTY

COMPLAINT

I.   **Previous lawsuits**

A.   Have you filed other cases in state or federal court dealing with the same facts as in this case or against the same defendants?

YES ☐   NO ☑

B.   If you answered YES, describe that case(s) in the spaces below.

1.   Parties to the other case(s):

Plaintiff: _____

Defendant(s): _____

2. Court (if a federal court name the district; if a state court name the city or county): _____

3. Case No.: _____

4. Date filed: _____

5. Name of judge that handled the case: _____

6. Disposition (won, dismissed, still pending, on appeal): _____

_____

7. Date of disposition: _____

II. Administrative proceedings

A. If you are a prisoner, did you file a grievance as required by the prison's administrative remedy procedures?

YES ☐   NO ☑

1. If you answered YES:

a. What was the result? _____

_____

b. Did you appeal?

YES ☐   NO ☐

2. If you answered NO to either of the questions above, explain why: I was not allowed access to writing material or th administrative remedy process following the incident on June 1, 2013 and the 30 day window to file ARP had past.

III.   Statement of claim

(Briefly state the facts of your case. Include dates, times, and places. Describe what each
defendant did or how he/she is involved. If you are making a number of related claims,
number and explain each claim in a separate paragraph.)

1) On June 1, 2013 at approximately 9:30am I Tracy L. Skinner wrote an Administrative remed Procedure on tier ofc. Juliet Ngeh Co. II

2) ofc. J. Ngeh Co. II then informed the supervisor Cpt. K. Ibeadogbulem by phone that I had written her up.

3) Captain K. Ibeadogbulem arrived on the tier minutes later.

     "See Attatched"

IV.   Relief

(State briefly what you want the Court to do for you)

Compensatory damages jointly and severly #1,100,000

Punitive damages jointly and severly #1,100,000

SIGNED THIS _12_ day of _January_, 2014.

Tracy L. Skinner
(original signature of plaintiff)

North Branch Correctional Inst.

14100 McMullen Hwy, S.W.

Cumberland, md. 21502
(address of plaintiff)

4) I approached Cpt. K. Ibeadogbulem, and asked him to sign the A.R.P.

5) Cpt. K. Ibeadogbulem replied, "and what if I don't?"

6) I stated that I will get a supervisor on another shift to sign it.

7) Cpt. Ibeadogbulem then stated, "This is paper. It is worthless. The badge is real power.", as he signed the A.R.P.

8) Cpt. K. Ibeadogbulem gave me my copy of the A.R.P, and I took it to my cell, wich is located on the back side of the tier.

9) Leaving my cell, on the way to the telephone, I was stopped by an inmate in shower area, and we was conversing.

10) Cpt. K. Ibeadogbulem called me to himself, and asked my why was I using profanity.

11) I kept silent.

12) Cpt. K. Ibeadogbulem said, "You are disrespecting me. Why are you cursing at me?"

13) I stated, "I was not talking to you, or about you."

14) I then turned, and started to walk away.

15) Cpt. Ibeadogbulem asked, "where are you going?"

16) I said, "to call home, and while I'm at it I'm going to have a family member call the prison, before his harassment gets out of hand."

17) Cpt. K. Ibeadogbulem then called a code on his radio, and said lock in

18) I asked, "what did I do to be locked in?"

19) Cpt. K. Ibeadogbulem ordered ofc. Juliet NGeh to put me in my cell.

20) Ofc. J. Ngeh grabbed me, and I pulled my arm away

21) Cpt. K. Ibeadogbulem, and ofc. J. Ngeh both grabbed me.

22) I shook them off of me, and pushed them away from me.

23) Inmate Jason Delong arrived at the scene, and started punching me in my stomach, and chest.

24) I backed away from Cpt. K. Ibeadogbulem, ofc. J. Ngeh, and Inmate J. Delong.

25) Sgt. Owens, and two (2) officers who's names I do not know arrived on the scene.

26) Sgt. Owens ordered me to lay down on the floor.

27) I complied by lying face down on the floor, spread eagle.

28) Sgt. Owens cuffed me behind my back while repeatedly yelling, "Fuck him up! Fuck him up!"

29) Sgt. Owens punched me on side of my face several times as the other two officers who's names I do not know kicked me in the ribs repeatedly.

30) Sgt. Owens began stomping on the back of my neck at the base of my skull.

31) I looked up, and saw ofc. J. Ngeh kick me in the face

32) Ofc. Fredericks, and Lt. David Johnson arrived on the scene, and began to stomp, and kick

me repeatedly.

33) I lost consciousness for an unknown amount of minutes.

34) when I regained consciousness, I was sitting on the floor propped up against a heater.

35) Sgt. Owens, and another officer lifted me to my feet, walked me to the hall way where I was examaned by medics.

36) Medics strapped me to a board with neck brace attatched, and I was transported by ambulance to the Shock Trauma Unit at the University of Maryland Medical Center, where I was treated back, and neck injuries, and multiple contusions.

37) The force was not applied by the prison officals in document until after I was lying on the ground in restraints.

38) A.R.P. was not filed in this case, because immediately upon my return from the hospital, I was placed on isolation, and denied access to writing material, and the administrative remedy process. 30 day period had past.

39) The incidents describeb above happened at Patuxent.

Relief

Plaintiff respectfully prays that this Honorable Court:

1) Grant Plaintiff # 1,100,000 jointly, and severly for compensatory damages.

2) Grant Plaintiff # 1,100,000 jointly, and severly for punitive damages.

I hereby declare, and affirm, upon personal knowledge and under the penalties of perjury that these statements are true and correct.

1/12/14
Date

Tracy L. Skinner
Plaintiff